

Instruction: W4.9.10	Issuer: Larry McDaniel
Issued Date: 4 / 26 / 01	Rev Date: 4 / 26 / 01
Approved By: <i>[Signature]</i>	

Tricon EMD  
CONTROLLED

EPA Region 5 Records Ctr.



264197

## Spill Contingency Plan Work Instruction

### 1.0 Purpose

To insure adequate control measures are in place to contain and clean a chemical spill within Tricon, EMD.

### 2.0 Scope

Finishing Department

Manufacturing - Janes Street and Wisconsin Avenue plants.

### 3.0 Responsibilities

Finishing Department employees

Plant Manager

Plant Superintendent (nights)

Designate

### 4.0 Instructions

4.1 Tricon continues to work with risk management consultants in reducing the possibility of spill or leakage of hazardous materials. To minimize the risk, Tricon has adopted the following guidelines.

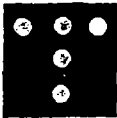
- Limit the quantities of hazardous material on hand.
- Proper storage and transportation of materials.
- Adequate training for all personnel working with or transporting hazardous materials.
- Maintain an up-to-date contingency plan.
- Adequately inform local emergency response agencies of materials on hand, storage techniques and emergency contact personnel.
- Maintain adequate supplies of spill clean-up and containment kits.

4.1.1 All floor drains in the vicinities of chemicals will be plugged. Chemicals in drums within the Plating/Finishing area will be placed on containment pallets or over spill containers.

4.1.2 Acids, cyanides, and caustic chemicals will be stored in locked cabinets. Control of these cabinets will be the responsibility of Finishing Department employees.

4.1.3 In the event of a mishap, the proper individuals and agencies will be notified. The Plant Manager or Manufacturing Director will coordinate this effort. If an evacuation is required, the Emergency Evacuation Guidelines will be followed.

4.1.4 Copies of this plan will be available at the MSDS centers, Finishing Department, and the Plant Manager's office.



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- 4.1.5 The Environmental Manager will update the plan whenever a new chemical or significant change to processes occurs.

#### **4.2 Reporting of a Slug Discharge**

- 4.2.1 A slug discharge is defined as a permitted pollutant or as a concentration five times or more the stated permitted limit, or a pollutant or chemical spill that would be discharged through the wastewater treatment.

- 4.2.2 The following information must be reported to the Downers Grove Sanitary District:

- The date and time of the incident
- The type and amount of material
- The cause of the incident
- The extent of personal injury and damage
- A written report must then be filled within 5 days describing the incident fully and what preventative actions will be taken.

- 4.3 On the following pages are listings of hazardous chemicals, the storage quantities, containers, locations, and a summary of clean-up guidelines. Of utmost concern is the safety of our employees and the local community. Because the chemicals used at Tricon present little immediate danger to the community, employee health and safety must be given top priority during an evacuation or clean-up program. If the Emergency Coordinator has any doubt of the risk to employees, he or she should immediately evacuate all personnel and confer with and utilize the expert advice of the appropriate agencies.

#### **4.3.1 ACIDS**

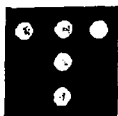
##### **Portable Containers (1 gallon or smaller)**

Acids in these quantities are to be stored in approved storage cabinets that include self-contained spill trays. Spills or leaks would be contained within cabinet.

- Probability of spill or leakage: Doubtful
- Maximum quantity of spill: Less than one gallon
- Possible cause of release: Container breakage
- **Clean-up procedure:** Use acid spill kit, located in finishing department, followed by approved disposal of clean-up kit. Neutralize with soda ash. Use approved personal protective equipment, goggles with shield, lab coat, apron, rubber gloves. Refer to MSDS.
- Environmental Damage: N/A
- Containment: Acid cabinet
- Not reportable for gallon spills.

##### **Thirty (30) gallon carboys**

Acids in carboys are to be stored in authorized area only. Area is such that there is restricted access and NO through traffic. Floor drains are not located in area. Drums are not to be opened and contents are not to be transferred to other containers while in storage area.



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- Probability of spill or leakage: Doubtful
- Maximum quantity of spill: Thirty (30) gallons
- Possible cause of release: Drum rupture
- **Clean-up procedure:** If conditions warrant, place leaky carboy in salvage drum to minimize discharge, or pump contents into another container. Use acid spill kit, located in Finishing Department, to absorb spill. Neutralize with soda ash. If possible, plug leak with drum plug. Dispose of drum and clean-up kit in approved manner. Use adequate protective equipment- goggles with shield, lab coat, apron, and rubber gloves.
- Environmental damage: No foreseeable damage. Leak maintained within over pack container.
- Not reportable for a spill of one container.

#### **Fifty-five (55) gallon drum (Deox cleaner)**

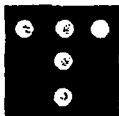
Fifty-five gallon drum to be stored within the Plating Department on containment pallet. Limit one drum in inventory.

- Probability of spill or leakage: Doubtful
- Maximum quantity of spill: Fifty-five (55) gallons
- Possible cause of release: Drum rupture
- **Clean-up procedure:** Place drum in salvage drum. Pump contents into different container, or plug leak with a drum plug. Use approved clean-up kit, located in Finishing Department to absorb spill. Neutralize with soda ash. Use adequate protective equipment, goggles with shield, lab coat, apron, and rubber gloves. See MSDS for additional information.
- Environmental damage: None
- Containment: In pallet within department
- Dispose of clean-up materials in properly labeled waste drums for proper disposal.
- Not reportable for spill of one container.

#### **4.3.2 CAUSTICS (SODIUM HYDROXIDE)**

Minimize hazard by limiting storage to one 55-gallon drum. Drum must be located in approved storage area away from traffic and floor drains. Drum is not to be opened nor contents to be transferred while in storage area. Drum is to be stored in upright position on containment pallet.

- Probability of spill or leakage: Doubtful
- Maximum quantity of spill: Fifty-five (55) gallons
- Possible cause of release: Drum rupture
- **Clean-up procedure:** Place drum in salvage drum. Pump contents into a different container, or plug leak with drum plug. Use approved clean-up kit to absorb spill. Dispose of drum and clean-up kit in approved manner. Use adequate protective equipment. Refer to MSDS.
- Environmental damage: Slight to None. Spill should be contained within building in containment pallet.
- Not reportable for spill of one container.



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#### 4.3.3 PLATING SOLUTIONS (also see Cyanides and Cyanide Solutions) NICKEL ELECTROLESS AND ELECTROLYTIC, COPPER, SILVER, GOLD SOLUTIONS

Solution stored in holding tank within the Plating Department. If leak develops, material is to be pumped into plating tank.

- Probability of spill or leak: Slight
- Maximum quantity of spill: 30 gallons
- Possible cause of release: Drum rupture
- **Clean-up procedure:** Minimize leak by pumping drum into plating tank. Use absorbent spill kit to contain spill. If spill cannot be contained with absorbent material, solutions entering drains will be caught in our wastewater pretreatment system. Shut down water flow into system in order to capture metal plating solutions. Materials will be settled out or treated before system can be reactivated. Avoid contact with acids.
- Floor drains in area will be plugged or raised to contain spill in department
- Environmental damage: Slight to None. Materials will be trapped within building and pretreatment system.
- A spill of one pound (1 lb.) or more of the cyanide solutions must be reported.
- A spill of ten pounds (10 lb.) or more of the other plating solutions must be reported.

#### 4.3.4 ALKALINE CLEANERS

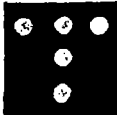
Alkaline cleaners may be white powder with no significant odor or off-white, opaque, viscous liquid with a soapy odor. Cleaners are stored within Plating Department.

- Probability of spill or leakage: Slight
- Maximum quantity of spill: 30 gallons
- Possible cause of release: Drum or container rupture
- **Clean-up procedure:** Flush spill area with water. Pretreatment system will neutralize pH as flushed materials enter drains and system. Place leaking container in salvage drum to minimize spill. Wear personal protective equipment. Refer to MSDS.
- Environmental damage: None. Pretreatment system capable of neutralizing pH.
- Liquid cleaners to be placed on containment pallet.
- Not reportable for spill of one container.

#### 4.3.5 OILS

Hydraulic, cutting, and compressor oils are used and stored in both buildings. Spills or machine leaks are recovered with absorbents. Oil-soaked absorbents are collected in drums and disposed of according to requirements.

- Probability of machine leakage: Doubtful
- Maximum quantity of spill: 55 gallons
- Possible cause of release: Drum puncture
- Probability of machine leak: Likely
- Maximum quantity of machine leakage: 5 gallons



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- **Clean-up procedure:** Contain spill or leakage using oil absorbent "socks". Use other absorbents to pick-up oil, dispose of absorbents in labeled 55-gallon drums.
- Environmental damage: None. Oil will be trapped within building; absorbents will be disposed of according to requirements.
- Not reportable for (non-hazardous) spills.

#### 4.3.6 PERCHLOROETHYLENE

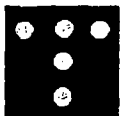
Perchloroethylene (including dirty Perchloroethylene) is stored in a restricted area. There are no drains in the area and there is no through traffic. Drums are stored in an upright position on containment pallets. Contents are transferred to vapor degreaser by mechanical pump in order to limit spills.

- Probability of spill or leakage: Doubtful
- Maximum quantity of spill: 55 gallons
- Possible cause of release: Drum puncture
- **Clean-up procedure:** Pump contents of leaking drum into another container or plug leak with drum plug. Use solvent cleanup kit and dam kits to restrict spill to small area. If significant leak occurs, there is some possibility of material flowing to the outside of building. However, leak should be maintained within building. Dispose of clean-up material, contaminated earth, and drum through an approved source. All contaminated material must be stored in sealed drums. Only individuals with proper respirator and protective equipment may be in the area. Refer to MSDS.
- Environmental Damage: Slight to none. Material should be trapped within the building. Ventilation system will discharge to minimum. Dispose of clean-up and containment materials in labeled barrel through an approved waste disposal company.
- Reportable for spills of 100 lbs. or more.

#### 4.3.7 ISOPROPYL ALCOHOL:

Isopropyl alcohol is stored in an approved flammable safety cabinet with proper grounding. There are four approved drip pans used within the Seam Welding Department. There are no floor drains in the area. Storage is limited to one 55-gallon drum that is maintained in an upright position.

- Probability of spill or leakage: Doubtful
- Maximum quantity of spill: 55 gallons
- Possible cause of release: Drum rupture or overturning drip pans
- **Clean-up procedure:** Pump contents of leaking drum into another container. Place drum in salvage drum or plug leak with drum plug. Use cleanup kit and dam kit, located in Assembly area, to restrict spill to small area. Leak should be maintained within building. Dispose of clean-up material and drum through an approved source. All contaminated materials must be stored in sealed drums. Only individuals with proper respirator and protective equipment may be in the area. Refer to MSDS.



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- Environmental damage: Spills would be restricted to the Assembly area. All electricity should be shut off in the area. There may be some vapors discharged through ventilation system, but prompt clean up will keep discharge to a minimum.
- Not reportable for spills of one drum.

#### 4.3.8 CYANIDES AND CYANIDE SOLUTIONS

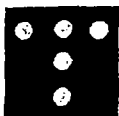
Potassium cyanide and plating solutions comprised of cyanides are used and stored within the Plating Department. There are also two storage cabinets containing cyanides. These cabinets are in an area without floor drains and are kept locked at all times. One cabinet contains cyanide in a dry form, and therefore, represents little spill potential. The other is a solution and there are spill trays within the cabinet. A spill of cyanide solutions within the Cleaning Department is unlikely but would not be significant. The spill could be recovered quickly and the area flushed with water. All floor drains within the area plugged or raised to contain spill. Acids are kept away from cyanides. Spills of cyanide solutions in a storage cabinet are unlikely, but could be maintained through the spill trays, clean-up kits and dam kits located in the Finishing Department. Only individuals with full-face respirators and appropriate personal protective equipment may be in the area. Refer to MSDS.

- Probability of spill or leakage: Doubtful
- Maximum quantity of spill: Cyanide solution 5 gallons; Cyanide powders/salts 75 pounds.
- Possible cause of release: Spill during transferring of materials to plating tanks or portable containers.
- Environmental damage: Clean-up procedures and handling procedures should prevent any environmental damage.
- **Clean-up procedure:** Neutralize with sodium hypochlorite. Dispose of clean-up and containment materials in labeled drum through an approved waste disposal company.
- Reportable for spills of 1 lb. or more.

#### 4.3.9 PLASTIC MOLDING COMPOUNDS

All compounds come in pellets or granule form. Accidental spill or discharge causes no health or environmental hazard. Materials should be immediately swept up to prevent fall hazards. Materials are stored in material storage area. In the event of a fire, materials will emit toxic vapors. Firefighters must use a positive pressure, self-contained breathing apparatus.

- Probability of spill or leakage: Spills of small quantities occur frequently
- Maximum quantity of spill: 100 pounds
- Possible cause of release: Torn or damaged storage bag
- Environmental damage: None except during fire when toxic fumes will be emitted. Ash from fire residue may contain toxic materials.
- Not reportable for spills.
- Materials / absorbents used in cleanup of a spill will be stored in drums for disposal by a licensed waste hauler.



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#### **4.4 Process Description**

- 4.4.1 Plant manufactures switches, contact assemblies, and insert molded assemblies. The forming and assembly processes include metal forming, degreasing, molding, spot welding, and final assembly.
- 4.4.2 Wastewaters from the manufacturing operations are generated primarily from parts washing operations and rinse waters. Wastewater treatment includes acid neutralization and overflow basins that allow for metals to settle out before discharge to treatment pit. The treatment effluent is discharged to the city sewer system. Solvents are not discharged into wastewater. Wastewater discharge flow does not exceed 8000 gallons/day.

#### **4.5 Solvent Usage and Control**

- 4.5.1 Plant operations involve organic solvent usage, which can contain one or more of the one hundred eleven (111) organic materials regulated under the metal finishing pretreatment regulations. These may be used in the cleaning of components during various phases of manufacture. All solvents are reclaimed. Solvents in use are presently limited to Perchloroethylene. Solvents to be stored on containment pallets.
- 4.5.2 Access to chemical storage cabinets will be limited to authorized Plating/Finishing employees.
- 4.5.3 The bulk of hazardous chemicals are used in the plating/finishing department, thus access will be controlled and limited to authorized plating/finishing personnel. Spent solvents used for cleaning will be collected in drums for proper disposal. All used and/or contaminated material will be stored in appropriately identified and labeled containers, and will be kept in a secured designated area until removed for reclamation or disposal by a licensed hazardous waste hauler.

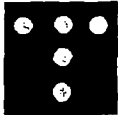
#### **4.6 Labeling**

- 4.6.1 All incoming containers, including bulk deliveries and subsequent re-drumming, containing regulated organic solvents and/or cleaners will be labeled upon receipt with the following information:

Material contains Regulated Organic Solvents

- A. Use only in designated area
- B. Do not permit this material to enter plant
- C. Dispose of only in designated and identified containers

- 4.6.2 Waste drums will be labeled with the following information:
- A. Nature of the contained waste
  - B. Date accumulation began
  - C. Hazard classification



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#### 4.7 Training

4.7.1 All personnel involved in degreasing activities will receive instructions in proper handling and disposal of solvents in order to keep regulated organic materials out of industrial wastewater. New employees will be trained in these procedures immediately. All personnel working in these activities are familiar with this solvent management plan and will follow the procedure established in this standard to eliminate regulated organic materials from entering the waste water system.

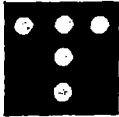
4.7.2 Training consists of classroom instructions which reviews the following:  
The organic solvents that are known to be in use at the plant and the areas in which they are used. The Solvent Management Plan and the proper procedures for handling and disposing of the respective solvents.

#### 4.8 Inspections

Degreasers are inspected routinely by the area supervisor to verify cleaning procedures and adherence to this solvent management plan to insure that it does not spill or leak into plant sewers.

#### 4.9 Control/Cleanup

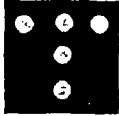
<u>ITEM</u>	<u>LOCATION</u>
Chemical Dam Kit	Assembly Department
Acid Spill Kit	Plating Department
Chemical Spill Kit	"
Solvent Spill Kit	"
Dam Kit	"
Acid Storage Cabinet	"
Full Face Respirator	"
Emergency Eye Wash Station	"
Emergency Shower	"
Gurney (wheel cot)	First Aid Room
Stretchers	"
Sprinkler System	South half of Wisconsin Ave. building
Sprinkler System	Janes building
Fire Extinguishers	Throughout both buildings
Empty drums	West side of Wisconsin building
Drum pump	Plating Department
Fire alarms	Throughout both buildings
Smoke Detectors	"
Sprinkler alarm system	At sprinkler standpipe
Acid Storage Cabinet	Plating Department
2 Cyanide Storage Cabinets	"
Flammable Fire Cabinet	Assembly Department
(1) Acid Storage Cabinet	Plating Department
Spill Stopper Mats	"
Hazardous Material Response Kit	"



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#### 4.10 CHEMICALS ON HAND AND QUANTITY

<u>CHEMICAL</u>	<u>QUANTITY</u>
Acetone	3.8 liters
Actane 73	100 lbs.
Actane 342	100 lbs.
Alkleen 501	5 Gal.
Ammonium Hydrate	40 lbs.
Benzotriazole	55 Gal.
Boric Acid	5 lbs.
Copper Cyanide	5 Gal.
Deox	55 Gal.
Electrolytic Nickel	35 Gal.
Enbond Q-527	100 lbs.
EDM 244 (Dielectric Fluid)	55 Gal.
EDTA	5 lbs.
Enplate NI-416 M	150 Gal.
Enplate NI-416 R	1 Qt.
Enplate NI-416 S	1 Qt.
Fluoboric Acid	100 ml
Hydrochloric Acid	10 lbs.
Isopropyl Alcohol	55 Gal.
Nickel Sulfamate	30 Gal.
Nitric Acid	10 liters
Oakite #3	100 lbs.
Oakite Metal Sheen	5 Gal.
Orosene 80 Brightener	2 Gal.
Orosene 80 Buffer Salts	20 lbs.
Orosene 80 Gold Plating Solution	30 Gal.
Orosene 80 Gold Salts	5 oz
Orotemp 24 Buffer Salts	10 lbs.
Orotemp 24 Gold Salts	5 oz
Perchloroethylene	160 Gal.
Phosphoric Acid	1 Gal.
Potassium Copper Cyanide	5 Gal.
Potassium Cyanide	75 lbs.
Potassium Hydroxide	5 lbs.
Potassium Silver Cyanide	100 oz
Silver Brightener E-2	2 Gal.
Silver Cyanide Plating Solution	30 Gal.
Silver Brightener B-2	1 liter
Sodium Cyanide (Hydrocyanic Acid)	2.5 kg
Sodium Dichromate	5 lbs.
Sodium Hydroxide	4 liters
Sodium Hypochlorite	110 Gal.
Sulfuric Acid	15 liters
Tower Hydraulic Oil	220 Gal.



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## **5.0 References**

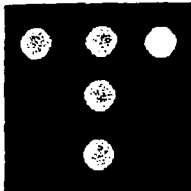
Downers Grove Sanitation Waste Water Discharge Permit #2  
Environmental Compliance Waste Management Work Instruction  
Hazard Communication Procedure

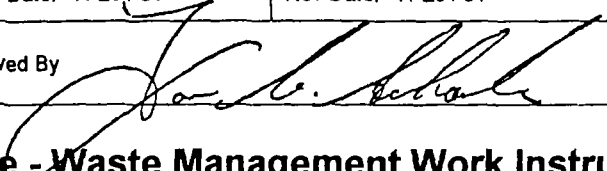
## **6.0 Records**

Manifests

## **7.0 Governing Policies**

Tricon, EMD, Quality Manual



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## **Environmental Compliance - Waste Management Work Instruction**

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### **1.0 Purpose**

To insure that Tricon is in compliance with relevant environmental legislation and regulations (40 CFR Part 260 through 263).

### **2.0 Scope**

Finishing Department  
Manufacturing - Janes Street and Wisconsin Avenue plants.

### **3.0 Responsibilities**

Finishing Department  
Plant Manager  
Maintenance Supervisor  
Designate

### **4.0 Definitions**

**Hazardous Waste:** Any chemical/material that according to applicable government safety and environmental regulations requires special handling, recycling, and disposing standards.

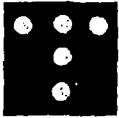
**Used Oil:** Hydraulic oil that can no longer be used.

**EDM:** Electric Discharge Machining

### **5.0 Instructions**

5.1 Tricon Industries will collect all hazardous and non-hazardous material in approved containers. All materials will be removed by Heritage Crystal-Clean. These materials are:

- Used Oil - burned for fuel.
- Oil Filters - Oil removed and burned, metal recycled.
- Absorbents - Oil removed and recycled.
- EDM Filters - Treated and recycled.
- Filter Paper - Paper burned for fuel.
- Solvent Parts Cleaning - Recycled.
- Nickel Waste - Treated and disposed of.
- Actane Waste - Treated and disposed of.
- Perchloroethylene Vapor Degreasing Waste - Cleaned and recycled.
- Aerosol Cans - Cans will be crushed and all propellants captured for recycling.
- Coolant - Metal removed and all recycled.
- Light Bulbs - All parts to be recycled.



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5.2 **Recyclables:** Cardboard and paper bags with plastic liners are compacted and baled for recycling.

5.3 **Labeling:** All chemicals, hazardous, and non-hazardous materials at Tricon are properly labeled. Labeling identifies the chemical or substance.

5.4 **Training:** All employees exposed to hazardous material will receive training in the handling of chemical products (as appropriate).

## 6.0 Reporting

6.1 Tricon Industries will keep the return copy of each hazardous waste manifest, signed by the designated facility, as well as the generator's original copy. All manifests, test results, waste determinations, and LDR forms must be filed on-site for at least three years from the date the waste was shipped off site.

6.2 The Illinois Special Waste Generation Report will be filled out for any year that Tricon ships to an out-of-state facility.

## 7.0 References

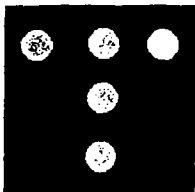
Hazard Communication Procedure  
Spill Contingency Work Instruction

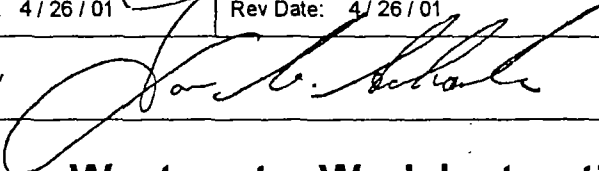
## 8.0 Records

Manifests - 3 years (See Section 6.0)

## 9.0 Governing Policies

Tricon, EMD, Quality Manual



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## **Environmental Compliance - Wastewater Work Instruction**

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### **1.0 Purpose**

To insure compliance to relevant Federal, State, and local environmental legislation (40 CFR Part 433).

### **2.0 Responsibilities**

Finishing Department employees  
Plant Manager  
Human Resources Manager

### **3.0 Definitions**

ORP: Oxygen Reduction Potential  
pH: Measurement of alkalinity / acidity

## **4.0 INSTRUCTIONS**

### **4.1 GENERAL**

- 4.1.1 Rinse water from the Plating and Finishing Department is pretreated prior to discharge to the sanitary sewer system. The treatment provided includes an alkaline chlorinating treatment for cyanide destruction and final pH adjustment.
- 4.1.2 Accumulated solids from the settling basin will be periodically analyzed, manifested, and disposed of in an appropriate manner that meets all applicable laws.
- 4.1.3 The discharge flow from the Finishing Department shall not exceed 8,500 gallons per day and a pH range of 6.0 to 9.0 (unless authorized by permit). Daily flow will be recorded on Form 4.9-32.
- 4.1.4 Sampling and analysis.

### **4.2 INSTRUCTION**

#### **4.2.1 pH**

- 4.2.1.1 Grab sample will be taken at point of discharge three (3) times per month (on an hourly basis) during the operation of the department. Analysis will be made using the electronic pH meter. Information will be recorded on Form 4.9-32.
- 4.2.1.2 The pH from cyanide pit will be taken from the meter on control panel (on an hourly basis) and recorded on Form 4.9-32.
- 4.2.1.3 The pH reading from control panel meter will be verified hourly (using starch paper) and the color will be recorded on Form 4.9-32.



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4.2.1.4 The acid pit pH will be taken from meter on control panel (on an hourly basis) and recorded on Form 4.9-32.

#### **4.2.2 ORP**

The readings will be taken from control panel meter (on an hourly basis) and recorded on Form 4.9-32.

#### **4.2.3 ANALYSIS FOR METAL CONCENTRATIONS**

- Composite samples will be taken three (3) times per month. These samples will be split between Downers Grove Sanitation and Enviro-Test.
- Analysis will be made for metal concentrations as spelled out in the waste water permit.

#### **4.2.4 WASTE WATER PRETREATMENT (see *Process Flow Diagram on page 3*)**

The system consists of pH and ORP control meters that regulate automatic pumps to dispense chemicals.

- Cyanide destruct is by 12.5% to 14.5% solution of Sodium Hypochlorite.
- pH adjust is by 50% solution of Sodium Hydroxide and 50% solution of sulfuric acid.

#### **4.2.5 REPORTING**

4.2.5.1 Reports from Enviro-Test will be reviewed and recorded on control charts posted in the Finishing department.

4.2.5.2 Quarterly reports detailing information from form 4.9-32 and Enviro-Test results will be made to Downers Grove Sanitary District by the 20<sup>th</sup> day of the month following the calendar quarter.

#### **4.2.6 CERTIFICATION**

Department employees and designates will be certified by the Environmental Protection Agency, State of Illinois as *Class "K" Industrial Wastewater Treatment Works Operators*.

### **5.0 References**

Article II (A), Section 400 of the Downers Grove Sanitary District's Sewer Use Ordinance.

Process Flow Diagram

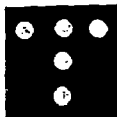
Class "K" Certificates

Environmental Compliance - Waste Management Work Instruction

Hazard Communication Procedure

### **6.0 Records**

Downers Grove Sanitary District Discharge Permit Number 2

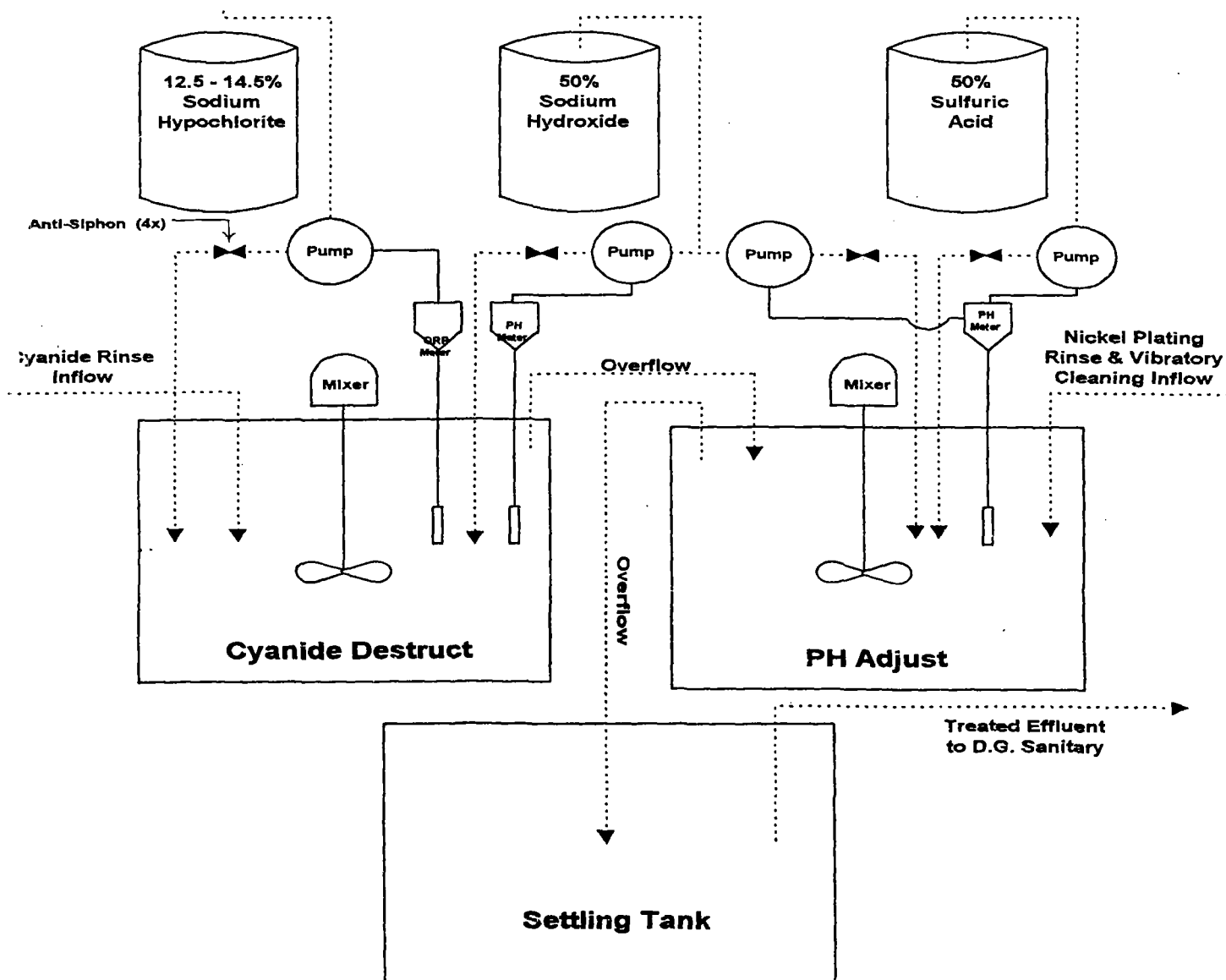


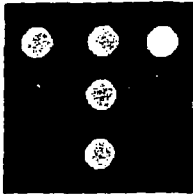
Instruction: W4.9.12	Issuer: L. McDaniel
Issued Date: 4/26/01	Rev Date: 4/26/01

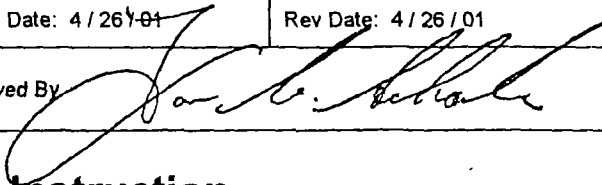
## 7.0 Governing Policies

Tricon, EMD, Quality Manual

### Wastewater Treatment Process Flow Diagram





Instruction: W4.9.8	Issuer: Larry McDaniel
Issued Date: 4 / 26 / 01	Rev Date: 4 / 26 / 01
Approved By: 	

Tricon EMD  
CONTROLLED

## Vapor Degreaser Work Instruction

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### 1.0 Purpose

To identify and prescribe safe operating procedures for the cleaning of the *Baron Blakeslee Vapor Degreaser*.

### 2.0 Scope

Finishing Department

### 3.0 Responsibilities

Finishing Department employees

### 4.0 Instructions

4.1 Complete and post Confined Space Entry Permit (Form 4.9-90).

4.2 Unit must be pumped empty of solvent the evening before scheduled cleaning.

4.3 Clean unit per the manufacturer's instructions.

#### 4.4 PRECAUTIONS

4.4.1 Do not swallow. Swallowing may cause injury or death.

4.4.2 Avoid contact with eyes. Will cause irritation and pain.

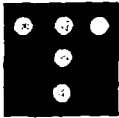
4.4.3. Avoid prolonged, repeated, or excessive contact with skin. May cause irritation and dermatitis.

4.4.4 Do not breathe vapors. High vapor concentrations can cause dizziness, unconsciousness, central nervous system depression, or death.

4.4.5 Vapors are heavier than air and will collect in low areas.

4.4.6 This material or its vapors when in contact with flames, hot glowing surfaces, or electric arcs can decompose to form hydrogen chloride gas and traces of phosgene.

4.4.7 Handling, storage, and use procedures must be carefully monitored to avoid spills or leaks. Any spill or leak has the potential to cause underground water contamination.



Instruction: W4.9.8	Issuer: Larry McDaniel
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#### **4.5 FIRST AID MEASURES**

4.5.1 **INHALATION:** Move person to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen.

4.5.2 **EYE/SKIN CONTACT:** In case of contact, immediately flush eyes and skin with plenty of water (soap and water for skin) for at least 15 minutes while removing contaminated clothing. Get medical attention if irritation persists. Thoroughly clean contaminated clothing before reuse.

#### **4.6 INGESTION**

4.6.1 If swallowed, give at least 3-4 glasses of water but do not induce vomiting. Do not give anything by mouth to an unconscious or convulsing person.

#### **5.0 References**

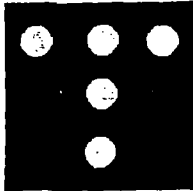
MSDS for Perchloroethylene (Tetrachloroethylene)  
Confined Space Entry Work Instruction

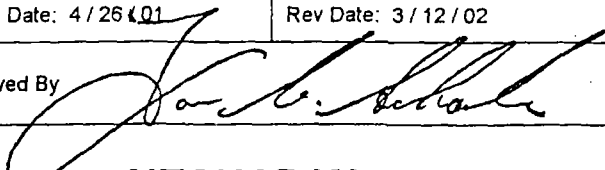
#### **6.0 Records**

Confined Space Entry Permits must be kept on file for three (3) years.

#### **7.0 Governing Policies**

Tricon, EMD, Quality Manual



Instruction: W4.9.5	Issuer: Larry McDaniel
Issued Date: 4 / 26 / 01	Rev Date: 3 / 12 / 02
Approved By: 	

Tricon EMD  
CONTROLLED

## Environmental Compliance - NESHAP Work Instruction

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### 1.0 Purpose & Scope

To insure that Tricon is in compliance with relevant environmental legislation and regulations (40 CFR Part 63 subpart T).

### 2.0 Scope

Finishing Department as it pertains to the *Baron Blakeslee* Vapor Degreaser.

### 3.0 Definitions

**Exceedance:** anytime a monitored control equipment parameter exceeds specifications. For example:

- Hoist speed: 11 feet per minute maximum
- Wind speed: 50 feet per minute maximum (over degreaser)
- Dwell time – if proper dwell time is not maintained
- Degreaser cover – if cover has cracks, holes, or other defects

**NESHAP:** National Emissions Standard for Hazardous Air Pollutants

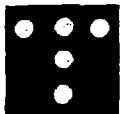
### 3.0 Responsibilities

Plant Manager  
Human Resources Manager  
Finishing Department employees

### 4.0 Instructions

#### 4.1 Record Keeping

- 4.1.1 Initial Compliance Report
- 4.1.2 Halogenated Solvent Cleaner Annual Reports
- 4.1.3 Halogenated Solvent Cleaner Exceedance Reports
- 4.1.4 Hoist Speed Record Keeping form  
Eleven (11) feet per minute maximum speed  
Record monthly on Form 4.9-89
- 4.1.5 Wind Speed Measurement Record Keeping form  
Fifty (50) feet per minute maximum  
Record quarterly on Form 4.9-87
- 4.1.6 Reduced Room Draft Initial Wind Speed Tests
- 4.1.7 Dwell Determination Test Record Keeping form
- 4.1.8 Dwell measurement Test Record Keeping form  
Thirty-five percent (35%) drip time  
Record monthly
- 4.1.9 Cover Record Keeping form  
Visual for defects and operation  
Record monthly on Form 4.9-92



Procedure: W4.9.5	Issuer: Larry McDaniel
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#### 4.1.10 Perchloroethylene Air Quality Monitoring Record

Fifty (50) parts per million (ppm)

Use *Draeger* Detector Tube System

Record quarterly on Form 4.9-91

#### 4.1.11 Compliance Determination Work Sheet

#### 4.1.12 NESHAP Certificates of Training

The retention time for all records is 5 years.

### 5.0 References

EPA-453/R-94-081 dated April 1995

Guidance Document for the Halogenated Solvent Cleaner NESHAP

### 6.0 Records

#### Reporting requirements:

*Solvent Consumption Annual Report* (submit by February 1)

*Exceedance Report* (submit by January 1 and July 1 or when an exceedance occurs)

*I.E.P.A. Annual Emission Report* (submit before May 1)

### 7.0 Governing Policies

Tricon, EMD, Quality Manual

Ref.: Underlined text reflects data changed since the last revision.